

Message

From: Long, Mike [Long.Mike@epa.gov]
Sent: 10/8/2020 7:20:29 PM
To: Calli, Rosemary [Calli.Rosemary@epa.gov]
CC: Laycock, Kelly [Laycock.Kelly@epa.gov]
Subject: RE: sub-categories for NHPA comment binning

Hi Rosemary, Anytime.

That makes sense about the previous comments.

Could you follow-up with Joe and agree with him on waiting until ERG get some letters on our rule rather than earlier rule comment which won't be appropriate.

Thanks!
Mike

From: Calli, Rosemary <Calli.Rosemary@epa.gov>
Sent: Thursday, October 08, 2020 2:43 PM
To: Long, Mike <Long.Mike@epa.gov>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>
Subject: RE: sub-categories for NHPA comment binning

Thank you, Mike! We only have two comments in so far on the action they are supporting. The comments he is asking about are on Florida's rulemaking which concluded earlier this year. Although they might provide insight into comments we can expect, we already considered those in providing recommended comment bins to ERG. Plus, many of those comments have been addressed by FDEP as its rulemaking evolved, or simply won't be repeated on EPA's action, so we won't see anything similar. I definitely don't want ERG burning hours unnecessarily reviewing comments from the state's earlier work when we might not see the same comments.

Rosemary (Hall) Calli
Section Chief, Wetlands & Streams Regulatory Section
Aquatic Ecotoxicologist
U.S. Environmental Protection Agency, Region IV

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Calli.Rosemary@epa.gov

From: Long, Mike <Long.Mike@epa.gov>
Sent: Thursday, October 8, 2020 2:33 PM
To: Calli, Rosemary <Calli.Rosemary@epa.gov>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>
Subject: RE: sub-categories for NHPA comment binning

Hi Rosemary,

No, with a contract, EPA doesn't pay for the contractor training. You are correct, it's what is expected already.

I think Joe could be referring to is getting his staff familiar with assigning a comment codes/sub-codes, etc. I'll follow-up with Joe in a moment to request clarification on training term.

Have you forward to Joe the Florida - Section 404 program comments. It seems a like an expected request.

Mike

From: Calli, Rosemary <Calli.Rosemary@epa.gov>
Sent: Thursday, October 08, 2020 2:22 PM
To: Long, Mike <Long.Mike@epa.gov>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>
Subject: FW: sub-categories for NHPA comment binning

Hi, Mike – Is this typical? I don't know that we need to pay for hours of ERG "training" staff how to sort comments. Being frank here, I would think that would be something they are prepared to do, as they were awarded the contract.
Thanks for any insight,
Rosemary

From: Joe Fanjoy <Joe.Fanjoy@erg.com>
Sent: Thursday, October 8, 2020 1:46 PM
To: Calli, Rosemary <Calli.Rosemary@epa.gov>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>; Long, Mike <Long.Mike@epa.gov>; Joe Fanjoy <Joe.Fanjoy@erg.com>; Kathleen Wu <kathleen.wu@erg.com>
Subject: RE: sub-categories for NHPA comment binning

Rosemary, so far, we have only two public comments on the assumption.

To help train ERG staff in coding letters (i.e., assigning a comment code/subcode), it might help to see the comments Florida received on the Section 404 program. How would I access those letters? Is there a docket number associated with that rule?

Thanks, Joe



From: Joe Fanjoy
Sent: Wednesday, October 7, 2020 5:04 PM
To: 'Calli, Rosemary' <Calli.Rosemary@epa.gov>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>; Long, Mike <Long.Mike@epa.gov>
Subject: RE: sub-categories for NHPA comment binning

Rosemary, no problem. I received what appears to be your full message at 4:53 pm.
Plus this one. Your message is consistent! Thanks!



From: Calli, Rosemary <Calli.Rosemary@epa.gov>
Sent: Wednesday, October 7, 2020 5:00 PM
To: Joe Fanjoy <Joe.Fanjoy@erg.com>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>; Long, Mike <Long.Mike@epa.gov>; Joe Fanjoy <Joe.Fanjoy@erg.com>
Subject: RE: sub-categories for NHPA comment binning

Hi, Joe – My computer is acting up and I may have hit ‘send’ prematurely, but can’t find evidence either way. On the Notice of Proposed Rule – we already considered the comments Florida received when we developed the list of anticipated comment categories, so no need for any further research there. Glad the timing was good.

~ Rosemary

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From: Joe Fanjoy <Joe.Fanjoy@erg.com>
Sent: Wednesday, October 7, 2020 4:10 PM
To: Calli, Rosemary <Calli.Rosemary@epa.gov>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>; Long, Mike <Long.Mike@epa.gov>; Joe Fanjoy <Joe.Fanjoy@erg.com>
Subject: RE: sub-categories for NHPA comment binning

Hi Rosemary, good timing, I was just reviewing our list. I’ve added these subcategories, no problem.

On one of our early calls, someone had mentioned public comments on a Notice of Proposed Rule. I think it was the attached notice.

Were there public comments on that? If so, would they be a useful reference?

Thanks, Joe

Joe Fanjoy
Ex. 6 Personal Privacy (PP) Mobile

www.erg.com

From: Calli, Rosemary <Calli.Rosemary@epa.gov>
Sent: Wednesday, October 7, 2020 3:40 PM
To: Joe Fanjoy <Joe.Fanjoy@erg.com>
Cc: Laycock, Kelly <Laycock.Kelly@epa.gov>; Long, Mike <Long.Mike@epa.gov>
Subject: sub-categories for NHPA comment binning

Hi, Joe – Our colleagues focused on NHPA have identified a few potential sub-categories. Could you add the following breakout to category #8 for the assumption comment binning, please? Also, we should call it simply “NHPA”, not “NHPA consultation.”

- a. Operating Agreement
- b. Programmatic Agreement
- c. Comments from Indian tribes
- d. Historic sites: Tribal
- e. Historic sites: Non-tribal

Thank you,
Rosemary

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